

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

WILLIAM A. BROOKS, III

**09 CR 10.05.6 MLW**

) CRIMINAL NO.

)

) VIOLATIONS:

) 18 U.S.C. § 641

) (Theft of Public Money)

) 18 U.S.C. § 1001

) (False Statements)

)

INDICTMENT

COUNT ONE: (18 U.S.C. § 641 - Theft of Public Money)

The Grand Jury charges that:

From in or about July 2003, and continuing through in or about March 2008, at Quincy and elsewhere, in the District of Massachusetts,

**WILLIAM A. BROOKS, III,**

defendant herein, did embezzle, steal, purloin, and knowingly convert to his own use, and to the use of another, money of the Social Security Administration, a department or agency of the United States, namely, Title II Social Security Disability Insurance payments to which he knew he was not entitled, such payments having a value exceeding \$1,000.

All in violation of Title 18, United States Code, Section 641.

COUNT TWO: (18 U.S.C. § 1001 - False Statements)

The Grand Jury further charges that:

On or about October 13, 2004, at Quincy and elsewhere, in the District of Massachusetts,

**WILLIAM A. BROOKS, III,**

defendant herein, in a matter within the jurisdiction of the United States Social Security Administration, did knowingly and willfully falsify and conceal material facts, and make materially false, fictitious and fraudulent statements, all in a Statement for Determining Continuing Eligibility for Title II Social Security Disability Insurance Payments.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL

Kara McFarland  
FOREPERSON OF THE GRAND JURY

CHRISTOPHER F. BATOR  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; March 4, 2009.

Returned into the District Court by the Grand Jurors and filed.

Paul B. Roland  
DEPUTY CLERK  
B:3/p.